Postal Regulatory Commission Submitted 11/19/2012 10:34:35 AM Filing ID: 85690 Accepted 11/19/2012

UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Modification of Mail Classification Schedule for International Priority Airmail and International Surface Airlift Services

Docket No. MC2013-14

PUBLIC REPRESENTATIVE COMMENTS ON POSTAL SERVICE NOTICE OF MINOR CLASSIFICATION CHANGE CONCERNING INTERNATIONAL PRIORITY AIRMAIL AND INTERNATIONAL SURFACE AIRLIFT

(November 19, 2012)

The Public Representative hereby provides comments pursuant to Order No. 1530. In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a minor change to the Mail Classification Schedule (MCS) concerning the competitive products International Priority Airmail (IPA) and International Surface Airlift (ISAL). The Postal Service proposes to amend the MCS by adding First-Class Package International Service (FCPIS) to the product description of each product. Id. The Attachment to the Notice presents the changes to the text of the IPA and ISAL product descriptions in the MCS.

The Postal Service states that IPA and ISAL, as currently described, are "bulk international mailing services for mailing First-Class Mail International items." Notice at 1. Recently, packages and rolls included within First-Class Mail International (FCMI) were transferred to the competitive product as a separate product known as First-Class Package International Service (FCPIS).³ As a result, packages and rolls are no longer

¹ PRC Order No. 1530, Notice and Order Concerning Minor Classification Change, November 5, 2012.

² Notice of Minor Classification Change, November 2, 2012, at 1 (Notice).

³ See PRC Order No. 1461, Order Approving Request for Product List Transfer, Docket No. MC2012-44, September 10, 2012.

Docket No. MC2013-14 PR Comments

eligible First-Class Mail International items for IPA and ISAL mailings. The Postal Service maintains that the addition of "First-Class Package International Service" to the product description of each product "will clarify that all shapes (including packages and rolls) are available for IPA and ISAL." Id.

COMMENTS

The Public Representative recommends Commission approval of this minor classification change. As the Postal Service states, this change "gives effect" to the recent transfer of packages and rolls from First-Class Mail International to the competitive product list. Id. The addition of "First-Class Package International Service" to the IPA and ISAL product descriptions permits the continued eligibility of packages and rolls for IPA and ISAL mailings.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

James F. Callow

Public Representative

901 New York Ave. NW Washington, DC 20268-0001 202-789-6839 callowjf@prc.gov